

IN THE UNITED STATES DISTRICT
COURT
FOR THE WESTERN DISTRICT OF
WISCONSIN

KATHERINE L. HALL,

Plaintiff

v.

BOSTON SCIENTIFIC CORPORATION,

Defendant.

Civil Action No.: 3:15-cv-00338-bbc

**PLAINTIFF'S MOTION TO
PERMIT LIVE TRIAL TESTIMONY VIA CONTEMPORANEOUS TRANSMISSION**

Plaintiff hereby respectfully moves this Court to issue subpoena forms and allow live trial testimony via contemporaneous transmission pursuant to Fed. R. Civ. P. 43 & 45.

As set forth more fully in Plaintiff's Memorandum in Support of this Motion, Plaintiff requests the trial testimony via contemporaneous transmission of current BSC employees Janice Connor, Doreen Rao and James Goddard. Although BSC maintains control over these three witnesses, it will not commit to producing them live at trial or agree to their testimony via live contemporaneous transmission. Because Connor, Rao and Goddard all live in Massachusetts, Plaintiff cannot otherwise compel to attendance in Madison.

CONCLUSION

For the foregoing reasons, and as set forth more fully in Plaintiff's Memorandum in Support of its Motion to Permit Live Trial Testimony via Contemporaneous Transmission, filed concurrently herewith, and the Exhibits attached hereto, Plaintiff respectfully requests the Court issue subpoena forms for Janice Connor, Doreen Rao and James Goddard and permit live trial

testimony via contemporaneous transmission for witness. Alternatively, Plaintiff requests that the Court either: (1) order a trial deposition of each witness; and (2) bar BSC from using live testimony of any witness it refuses to make available for Plaintiff's case.

Dated: August 26, 2015

By: /s/ Aimee H. Wagstaff
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CERTIFICATE OF SERVICE

I hereby certify that on August 26, 2015 I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive service in this matter.

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